

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
TENNESSEE, AT KNOXVILLE

TINA MULLINAX;  
BRIAN MULLINAX; and  
ROBIN SUTTON;

Plaintiffs;

v.

SEVIER COUNTY,  
SEVIER COUNTY AMBULANCE  
SERVICE;  
MICHAEL O'CONNOR, EMT IV;  
BLAKE GREGG;  
TODD SPENCE;  
JUSTIN JOHNSON, SCSO;  
SCSO CORPORAL BART TYNER;  
SCSO DEPUTY JESSICA SAVARESE;  
SCSO DEPUTY MICHAEL PHIPPS;  
SCSO DEPUTY WATTS;  
SCSO INVESTIGATOR JOHNNY  
BOHANON;  
SCSO SERGEANT WAYNE PATTERSON;

Defendants.

No. 3:18-cv-00002

Jury Trial Demanded

---

**PLAINTIFFS' REVISED WITNESS, EXHIBIT, AND DAMAGES LIST**

---

Now come Plaintiffs, by and through undersigned counsel, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court's Scheduling Order [Doc. 25], and provide their witness, exhibit, and damages list as follows:

**Witnesses Plaintiffs expect to present at trial:**

1. All Plaintiffs,
2. All Defendants,



3. Any and all Defense witnesses, as well as rebuttal witnesses,
4. Brian Delius,
5. Records custodian of Sevier County Circuit Court Clerk,
6. Records custodian of Sevier County Sheriff's Office,
7. Chief Michael Hodges,
8. Sheriff Ron Seals,
9. Traci K. McClanahan,

**Witnesses Plaintiff may call to testify at trial:**

1. Major Karl Tuner,
2. Washington County Lt. Wiseman,
3. Washington County Deputy Ratliff,
4. Angie McIntyre,
5. Records custodian of Johnson City Police Department,
6. Former Chief of Police Mark Sirois of Johnson City PD,
7. Capt. Steve Smith of Johnson City PD,

**Exhibits**

1. All defense exhibits,
2. Trial transcript from trial of Brian and Tina Mullinax,
3. Incident reports,
4. Justin Johnson medical records,
5. Tina Mullinax medical records,
6. Sevier County personnel file of Justin Johnson,

7. Johnson City personnel file of Justin Johnson,
8. Sevier County training records of Justin Johnson,
9. Johnson City training records of Justin Johnson,
10. Booking report of Tina Mullinax,
11. Booking report of Brian Mullinax,
12. Sevier County Judgement for Brian Mullinax,
13. Sevier County Judgement for Tina Mullinax,
14. Sevier County Jail records for Brian Mullinax,
15. Sevier County Jail records for Tina Mullinax,
16. Recording of phone call between Brian Delius and Robin Sutton,
17. Sevier County Responses to Interrogatories, Requests for Production, and Requests for Admission of Brian Mullinax,
18. Sevier County Responses to Interrogatories, Requests for Production, and Requests for Admission of Tina Mullinax,
19. Justin Johnson body cam,
20. Bart Tyner body cam,
21. Officers Watts, Husky, Hays, Phipps, and Patterson body cams,
22. Sevier County Notice of Termination of Justin Johnson,
23. Sevier County Employee Action Form for Justin Johnson,
24. Letter of resignation of Justin Johnson,
25. Witness/Officer statements,
26. Screenshot image showing phones examined at residence of Robin Sutton.

### **Damages**

1. Emotional pain and suffering, and fear of Brian Mullinax - \$30,000. Damages will be established through presentation of testimony of victims and witnesses.
2. Physical and emotional pain and suffering and fear of Tina Mullinax - \$40,000. Damages will be established through presentation of records and testimony of victims and witnesses.
3. Loss of liberty of Brian Mullinax resulting from illegal arrest, prosecution, and incarceration for forty-two days at a rate of approximately \$3,571.43 per day for a total of \$150,000. Damages will be established through presentation of testimony of victims and witnesses.
4. Loss of liberty of Tina Mullinax resulting from illegal arrest, prosecution, and incarceration for forty-two days at a rate of approximately \$3,571.43 per day for a total of \$150,000. Damages will be established through presentation of testimony of victims and witnesses.
5. Emotional pain and suffering and fear of Robin Sutton - \$24,000. Damages will be established through presentation of testimony of victims and witnesses.
6. Property damage of Robin Sutton - \$5,000 for damage to trailer caused by seven through and through bullet holes going through two walls. Damages will be established through presentation of testimony of victims and witnesses.
7. Invasion of privacy of Robin Sutton - \$1,000. Damages will be established through presentation of testimony of victims and witnesses.
8. Punitive damages of \$350,000. Damages will be established through presentation of testimony of victims and witnesses.
9. Costs of trial and defense.
10. Attorney fees.

Respectfully submitted this 18th day of March, 2020,

By: s/ Cameron D. Bell  
Cameron D. Bell, BPR # 027772  
Attorney for Plaintiffs  
800 S. Gay Street  
Suite 1950  
Knoxville, TN 37929  
cameron@bellyoung.com  
(865) 521-7468